



Bureau of Air Quality Synthetic Minor Construction Permit

**Fujifilm Manufacturing USA, Inc.
211 Pucketts Ferry
Greenwood, South Carolina 29649
Greenwood County**

Pursuant to the provisions of the *Pollution Control Act*, Sections 48-1-50(5) and 48-1-110(a), the 1976 *Code of Laws of South Carolina*, as amended, and *South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards*, the Bureau of Air Quality authorizes the construction of this facility and the equipment specified herein in accordance with the plans, specifications, and other information submitted in the construction permit application received on September 15, 2016, as amended. All official correspondence, plans, permit applications, and written statements are an integral part of the permit. Any false information or misrepresentation in the application for a construction permit may be grounds for permit revocation.

The construction and subsequent operation of this facility is subject to and conditioned upon the terms, limitations, standards, and schedules contained herein or as specified by this permit and its accompanying attachments.

Permit Number: 1240-0046-CQ
Issue Date: ISSUED DATE

**Engineering Services Division
Bureau of Air Quality**

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A. PROJECT DESCRIPTION

This project is a synthetic minor construction project to establish a Federally Enforceable production limit of 20,000,000 square meters per year (m²/year) (maximum) of Plastic Web with Clear Overlay Material. The Plastic Web with Clear Overlay Material is a new product which will be produced on the existing permitted production line, F-Plant Unit ID 15- Ink Jet Coating/Drying.

B.1 EQUIPMENT

Equipment ID	Equipment Description	Control Device ID	Emission Point ID
Unit 15 / IJP-C/D	F-Plant Ink Jet Paper Production- Plastic Web with Clear Overlay Material	None	IJP-C/D

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.1	<p>Equipment/Control Device ID: All</p> <p>(S.C. Regulation 61-62.1, Section II.J.1.g) A copy of the Department issued construction and/or operating permit must be kept readily available at the facility at all times. The owner or operator shall maintain such operational records; make reports; install, use, and maintain monitoring equipment or methods; sample and analyze emissions or discharges in accordance with prescribed methods at locations, intervals, and procedures as the Department shall prescribe; and provide such other information as the Department reasonably may require. All records required to demonstrate compliance with the limits established under this permit shall be maintained on site for a period of at least 5 years from the date the record was generated and shall be made available to a Department representative upon request.</p>
C.2	<p>Equipment/Control Device ID: Unit ID 15/IJP-C/D – Plastic Web with Clear Overlay Material</p> <p>(S.C. Regulation 61-62.5, Standard No. 4, Section IX) Where construction or modification began after December 31, 1985, emissions from this source (including fugitive emissions) shall not exhibit an opacity greater than 20%.</p> <p>The owner/operator shall perform a visual inspection on a semiannual basis during source operation. Logs shall be kept to record all visual inspections, noting color, duration, density (heavy or light), cause, and corrective action taken for any abnormal emissions. If a source did not operate during the required visual inspection time frame, the log shall indicate such. The owner/operator shall submit semiannual reports. The report shall include records of abnormal emissions, if any, and corrective actions taken. If there are no deviations then the owner/operator shall specify accordingly.</p>

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C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
	Visual inspection means a qualitative observation of opacity during daylight hours. The observer does not need to be certified to conduct valid visual inspections. However, at a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, and observer position relative to lighting, wind, and the presence of uncombined water.
C.3	<p>Equipment/Control Device ID: Unit ID 15/IJP-C/D – Plastic Web with Clear Overlay Material</p> <p>The facility has agreed to federally enforceable operating limitations to limit its production of the Plastic Web with Clear Overlay Material to a maximum of 20,000,000 square meters per year (m²/year).</p> <p>Production of the Plastic Web with Clear Overlay Material is limited to a maximum of 20,000,000 square meters per year (m²/year). The owner/operator must record the actual production monthly. The owner/operator shall calculate a twelve-month rolling sum for total production. The twelve-month rolling sum shall be less than 20,000,000 square meters per year (m²/year). Reports of the production rate shall be submitted semiannually.</p>

D. NESHAP PERIODIC REPORTING SCHEDULE SUMMARY

NESHAP Part	NESHAP Subpart	Compliance Monitoring Report Submittal Frequency	Reporting Period	Report Due Date
63	Subpart JJJJ (4J)	Semi-Annual	January 1 through June 30 July 1 through December 31	Postmarked no later than January 31 and July 31
<p>1. This table summarizes only the periodic compliance reporting schedule. Additional reports may be required. See specific NESHAP Subpart for additional reporting requirements and associated schedule.</p> <p>2. This reporting schedule does not supersede any other reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, 40 CFR Part 63, and/or Title V. The MACT reporting schedule may be adjusted to coincide with the Title V reporting schedule with prior approval from the Department in accordance with §63.10.a.5. This request may be made 1 year after the compliance date for the associated MACT standard.</p>				

E. NESHAP - CONDITIONS

Condition Number	Condition
E.1	All NESHAP notifications and reports shall be sent to the Manager of the Air Toxics Section, South Carolina Department of Health and Environmental Control - Bureau of Air Quality.

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E. NESHAP - CONDITIONS

Condition Number	Condition
E.2	All NESHAP notifications and the cover letter to periodic reports shall be sent to the United States Environmental Protection Agency (US EPA) at the following address or electronically as required by the specific subpart: US EPA, Region 4 Air, Pesticides and Toxics Management Division 61 Forsyth Street SW Atlanta, GA 30303
E.3	This facility has processes subject to the provisions of S.C. Regulation 61-62.63 and 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants, Subparts A and Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating. Existing affected sources shall be in compliance with the requirements of these Subparts by the compliance date, unless otherwise noted. Any new affected sources shall comply with the requirements of these Subparts upon initial start-up unless otherwise noted.

F. AMBIENT AIR STANDARDS REQUIREMENTS

Condition Number	Condition
F.1	<p>Air dispersion modeling (or other method) has demonstrated that this facility's operation will not interfere with the attainment and maintenance of any state or federal ambient air standard. Any changes in the parameters used in this demonstration may require a review by the facility to determine continuing compliance with these standards. These potential changes include any decrease in stack height, decrease in stack velocity, increase in stack diameter, decrease in stack exit temperature, increase in building height or building additions, increase in emission rates, decrease in distance between stack and property line, changes in vertical stack orientation, and installation of a rain cap that impedes vertical flow. Parameters that are not required in the determination will not invalidate the demonstration if they are modified. The emission rates used in the determination are listed in Attachment - Emission Rates for Ambient Air Standards of this permit. Higher emission rates may be administratively incorporated into Attachment - Emission Rates for Ambient Air Standards of this permit provided a demonstration using these higher emission rates shows the attainment and maintenance of any state or federal ambient air quality standard or with any other applicable requirement. Variations from the input parameters in the demonstration shall not constitute a violation unless the maximum allowable ambient concentrations identified in the standard are exceeded.</p> <p>The owner/operator shall maintain this facility at or below the emission rates as listed in Attachment - Emission Rates for Ambient Air Standards, not to exceed the pollutant limitations of this permit. Should the facility wish to increase the emission rates listed in Attachment - Emission Rates for</p>

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F. AMBIENT AIR STANDARDS REQUIREMENTS

Condition Number	Condition
	Ambient Air Standards, not to exceed the pollutant limitations in the body of this permit, it may do so by the administrative process specified above. This is a State Only enforceable requirement.

G. PERIODIC REPORTING SCHEDULE

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the startup date of the source.)	Report Due Date
Quarterly	January-March April-June July-September October-December	April 30 July 30 October 30 January 30
Semiannual	January-June April-September July-December October-March	July 30 October 30 January 30 April 30
Annual	January-December April-March July-June October-September	January 30 April 30 July 30 October 30

Note: This reporting schedule does not supersede any federal reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, and 40 CFR Part 63. All federal reports must meet the reporting time frames specified in the federal standard unless the Department or EPA approves a change.

H. REPORTING CONDITIONS

Condition Number	Condition
H.1	Reporting required in this permit, shall be submitted in a timely manner as directed in the Periodic Reporting Schedule of this permit.
H.2	All reports and notifications required under this permit shall be submitted to the person indicated in the specific condition at the following address: 2600 Bull Street Columbia, SC 29201 The contact information for the local EQC Regional office can be found at: http://www.scdhec.gov
H.3	The owner/operator shall submit written notification to the Director of Engineering Services of the date construction is commenced, postmarked within 30 days after such date.

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H. REPORTING CONDITIONS

Condition Number	Condition
H.4	Unless elsewhere specified within this permit, all reports required under this permit shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality.
H.5	<p>(S.C. Regulation 61-62.1, Section II.J) For sources not required to have continuous emissions monitors, any malfunction of air pollution control equipment or system, process upset or other equipment failure which results in discharges of air contaminants lasting for one hour or more and which are greater than those discharges described for normal operation in the permit application shall be reported to the Department's local Environmental Quality Control Regional office within 24 hours after the beginning of the occurrence.</p> <p>The owner/operator shall also submit a written report within 30 days of the occurrence. This report shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality and shall include, at a minimum, the following:</p> <ol style="list-style-type: none">1. The identity of the stack and/or emission point where the excess emissions occurred;2. The magnitude of excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the excess emissions;3. The time and duration of excess emissions;4. The identity of the equipment causing the excess emissions;5. The nature and cause of such excess emissions;6. The steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunction;7. The steps taken to limit the excess emissions; and,8. Documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated, to the maximum extent practicable, in a manner consistent with good practice for minimizing emissions.

I. PERMIT EXPIRATION AND EXTENSION

Condition Number	Condition
I.1	<p>(S.C. Regulation 61-62.1, Section II.A.4) Approval to construct shall become invalid if construction:</p> <ol style="list-style-type: none">a. is not commenced within 18 months after receipt of such approval;b. is discontinued for a period of 18 months or more; orc. is not completed within a reasonable time as deemed by the Department. <p>The Department may extend the construction permit for an additional 18-month period upon a satisfactory showing that an extension is justified. This request must be made prior to the permit expiration.</p>
I.2	This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date.

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J. PERMIT TO OPERATE

Condition Number	Condition
J.1	(S.C. Regulation 61-62.1 Section II.F.2) The owner/operator or professional engineer in charge of the project shall certify that, to the best of his/her knowledge and belief and as a result of periodic observation during construction, the construction under application has been completed in accordance with the specifications agreed upon in the construction permit issued by the Department.
J.2	If construction is certified as provided in S.C. Regulation 61-62.1 Section II.F.2, the owner or operator, may operate the source in compliance with the terms and conditions of the construction permit until the operating permit is issued by the Department.
J.3	<p>If construction is not built as specified in the permit application and associated construction permit(s), the owner/operator must submit to the Department a complete description of modifications that are at variance with the documentation of the construction permitting determination prior to commencing operation.</p> <p>Construction variances that would trigger additional requirements that have not been addressed prior to start of operation shall be considered construction without a permit.</p>
J.4	(S.C. Regulations 61-62.1 Section II.F.3 and 61-62.70.7) The owner or operator shall submit a written request to the Director of the Engineering Services for a new or revised operating permit to cover any new or altered source postmarked within 15 days after the actual date of initial startup unless a more stringent time frame is required by regulation. The request should be made using the appropriate Title V modification form.

K. GENERAL CONDITIONS

Condition Number	Condition
K.1	The permittee shall pay permit fees to the Department in accordance with the requirements of S.C. Regulation 61-30, Environmental Protection Fees.
K.2	<p>In the event of an emergency, as defined in S.C. Regulation 61-62.1, Section II.L, the owner or operator may document an emergency situation through properly signed, contemporaneous operating logs, and other relevant evidence that verify:</p> <ol style="list-style-type: none">1. An emergency occurred, and the owner or operator can identify the cause(s) of the emergency;2. The permitted source was at the time the emergency occurred being properly operated;3. During the period of the emergency, the owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and4. The owner or operator gave a verbal notification of the emergency to the Department within 24 hours of the time when emission limitations were exceeded, followed by a written report within 30 days. The written report shall include, at a minimum, the information required by S.C. Regulation 61-62.1, Section II.J.1.c.i through viii. The written report shall contain a

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K. GENERAL CONDITIONS

Condition Number	Condition
	<p>description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.</p> <p>This provision is in addition to any emergency or upset provision contained in any applicable requirement.</p>
K.3	<p>(S.C. Regulation 61-62.1, Section II.O) Upon presentation of credentials and other documents as may be required by law, the owner or operator shall allow the Department or an authorized representative to perform the following:</p> <ol style="list-style-type: none">1. Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.3. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.4. As authorized by the Federal Clean Air Act and/or the S.C. Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

L. EMISSIONS INVENTORY REPORTS

Condition Number	Condition
L.1	<p>All newly permitted and constructed Title V sources and/or Non-attainment Area Sources shall complete and submit an emissions inventory consistent with the schedule approved pursuant to S.C. Regulation 61-62.1, Section III. These Emissions Inventory Reports shall be submitted to the Manager of the Emissions Inventory Section, Bureau of Air Quality.</p> <p>This requirement notwithstanding, an emissions inventory may be required at any time in order to determine the compliance status of any facility.</p>

